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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* ALL PAPERS SHALL BE FILED IN THE  
LEAD CASE, NO. 19-30088 (DM)*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' OPPOSITION  
TO EX PARTE APPLICATION OF  
CLAIMANT KOMIR, INC.**

**[Related to Dkt. No. 14253]**

**Hearing Scheduled January 9, 2024**

Date: January 9, 2024

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 Reorganized Debtors PG&E Corporation and Pacific Gas and Electric Company herby oppose  
2 Komir's *Ex Parte* Application [Dkt. No. 14253] of January 3, 2024, regarding the hearing presently set  
3 for January 9, 2024.

4 Komir's *Ex Parte* Application is a thinly veiled improper motion for reconsideration. The  
5 Court issued a Docket Text Order December 26, 2023, as follows:

6 **DOCKET TEXT ORDER** (no separate order issued:) The court has decided to DENY the  
7 Second Motion For Partial Summary Judgment (Dkt 14007) filed by Amir Shahmirza, et al,  
8 and argued and submitted for decision on December 19, 2023. It rejects the position urged by  
9 movants that the non-payment of real property taxes by PG&E is fatal to its easement claim  
10 under Hansen v Sandridge Partners. The court is preparing an oral ruling to explain its  
reasoning in detail that it will present on January, 9, 2024, at 10:00 AM and follow with a  
written order denying the motion. (Montali, Dennis)

11 Komir fails to offer any procedural basis for such additional briefing. The Local Bankruptcy  
12 Rules do not provide for the submission of supplementary material under Civil Local Rule 7-3. Civil  
13 Local Rule 7-3 is not incorporated into the Bankruptcy Local Rules. *See* L.B.R. 1001-2(a) (list of  
14 Civil Local Rules applicable to bankruptcy cases does not include Civil L.R. 7-3).

15 If Komir intends to file a motion for reconsideration, the *Ex Parte* Application does not address  
16 the applicable standards for such extraordinary relief. *See, e.g.,* Fed. R. Bankr. P. 9023; *School Dist.*  
17 *No. 1J, Multnomah County, Oregon v. Acands Inc.*, 5 F.3d 1255, 1263 (9th Cir. 1993).

18 Nevertheless, if the Court decides to allow the supplemental filing by Komir, the Reorganized  
19 Debtors request that they be allowed to respond to the merits of such filing.

20 Dated: January 4, 2024

**KELLER BENVENUTTI KIM LLP**  
**ROVENS LAMB LLP**  
**LAW OFFICES OF JENNIFER L. DODGE, INC.**

21 By: /s/ Steven A. Lamb  
22 Steven A. Lamb  
23 Attorneys for Debtors and Reorganized Debtors  
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